

## FREEDOM COURT REPORTING

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1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE EASTERN DISTRICT OF TEXAS  
3                   MARSHALL DIVISION  
4                   CASE NO. 2:08-cv-422 TJW

5 \_\_\_\_\_  
6 \_\_\_\_\_  
7   PATTY BEALL, MATTHEW  
8   MAXWELL, TALINA MCELHANY AND  
9   KELLY HAMPTON, individually  
10   and on behalf of all other  
11   similarly situated;  
12   Plaintiffs,  
13   vs.  
14   TYLER TECHNOLOGIES, INC., AND  
15   EDP ENTERPRISES, INC.,  
16   Defendants.

17 \_\_\_\_\_  
18 \_\_\_\_\_  
19                   DEPOSITION OF TRAVIS VOID

20  
21   At Raleigh, North Carolina  
22   July 29, 2010  
23   2:25 p.m. - 4:30 p.m.  
24   Reported by: Rebecca L. Crunk

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2

3 For the Plaintiffs: Laureen F. Bagley, Esq.  
4 Sloan, Bagley, Hatcher & Perry  
5 101 East Whaley Street  
6 Post Office Drawer 2909  
7 Longview, Texas 75606

8

9 For the Defendants: Paulo B. McKeeby, Esq.  
10 Morgan, Lewis & Bockius  
11 1717 Main Street  
12 Suite 3200  
13 Dallas, Texas 75210

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1           available on the drop down box, and I think you said  
2           you weren't sure.

3    A.   Not sure.

4    Q.   What does training phase one mean? I mean, what type  
5           of training is done in phase one or when you entered  
6           that for that week in January, what type of training  
7           were you assigning the phase one designation?

8    A.   Phase one is usually financials training, depending  
9           on how the client bought the software.

10   Q.   Okay. And when you say financials training, what  
11          does that mean? Does that mean training end users  
12          how to utilize the software? Does it mean training  
13          people as to setting up the system or something else?

14   A.   That would encompass all with that for financials.

15   Q.   And that's all -- would all be included under phase  
16          one training.

17   A.   To my understanding, yes.

18   Q.   In terms of your job at Tyler Technologies as an  
19          implementation consultant, what other types of  
20          training are there other than what you've described  
21          just now?

22   A.   Outside of financials training?

23   Q.   Yeah. Well, or phase one. You've -- I want you to,  
24          if you can, provide a list to me of the different --

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1 I don't know if it's easier to call them phases for  
2 you, or if it's better to break it into subject  
3 matters.

4 A. Subject matters.

5 Q. That's your preference?

6 A. Yes.

7 Q. Okay. So we've talked about setting up the system.  
8 I'm going to call that one aspect of training; is  
9 that fair?

10 A. Yes.

11 Q. And you talked about end user training, I mentioned  
12 that and you agreed.

13 A. Yes.

14 Q. What other designations or descriptions of training  
15 are there?

16 A. Conversion training.

17 Q. Anything else?

18 A. Setup, conversion, implementation training, post live  
19 support.

20 Q. Is implementation training the same as end user  
21 training?

22 A. End user training is encompassed into implementation  
23 training.

24 Q. Okay. And are you also at the client's site when

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1       they go live?

2       A.    Yes.

3       Q.    Can we call that go live support?

4       A.    Yes.

5       Q.    Is that what you call it?

6       A.    Yeah. We do call it go live support.

7       Q.    Okay. So you've just told me of the different types

8       of functions that you perform at the customer sites,

9       training regarding setting up the system,

10      implementation training, conversion training.

11      A.    Yes.

12      Q.    Go live support and post live support.

13      A.    Yes. You may want to flip the implementation

14      training and conversion training. Conversion comes

15      first.

16      Q.    Okay. With that listing of those different

17      functions, what percentage of your job as an

18      implementation consultant have we discussed? In

19      other words, I don't know, you may have liked that

20      question, but I didn't.

21      Of these five different categories of functions, all

22      of which -- these are all performed at the customer

23      site.

24      A.    Yes.

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1 Q. Okay. What percentage of your overall -- I  
2 understand some of this that could be done remotely.

3 A. Right.

4 Q. Okay. Forget about remote or on site at this point,  
5 but I want to get a sense of what percentage of your  
6 job do these five components make up. Is this half  
7 of your job, 75 percent of your job? And I know  
8 we're not going to get a precise percentage, but an  
9 approximation.

10 A. Right. That's basically all of my job. The stuff  
11 that's not included -- I guess what's not -- like,  
12 what's not included here is what happens off site.

13 Q. At the office.

14 A. No. Like, in the hotel room or in the airport or on  
15 the weekend when you're answering an email or you're  
16 trying to figure out some more stuff that's going on  
17 with the software.

18 Q. Okay.

19 A. So that's what all I include here is, like, on site.  
20 None of the off site stuff is here. That's why it's  
21 40 hours here.

22 Q. Right. But what about the work at the office that's,  
23 I think we saw one of the designations, as  
24 administrative?

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1 A. Yes. That is --

2 Q. That's another.

3 A. That's another function, right. That's another  
4 function. So I guess that would be -- that would be,  
5 like, I guess 50 percent because if I'm in the  
6 office, then I'm using a template to actually update  
7 documents that are on the knowledge base, follow up  
8 on some support work, do my time sheets, do my  
9 expense reports, get prepared for an upcoming client,  
10 and that would be, like, my administrative type work.

11 Q. Okay. Same question. What you've just described as  
12 your administrative office work, and you've broke it  
13 down into different components, and I'm not saying  
14 that those are all the different components of what  
15 you do at the office, but what percentage of your job  
16 is spent at the office doing these -- for example,  
17 these types of administrative functions that you've  
18 just listed?

19 A. When I'm in the office, what percentage?

20 Q. No. I mean overall, so overall percentage of your  
21 job is working at the office handling, for example,  
22 these kinds of administrative functions.

23 A. Okay. And then what percentage is -- what percentage  
24 is on site?

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1 MS. BAGLEY: I'm going to object to the form.

2 BY MR. McKEEBY:

3 Q. Okay. I'll see if I can't -- I'll do the math after  
4 that or I'll help you. We can do it together.

5 But first let's focus on this question which is: How  
6 much of your job is typically, and I know it's going  
7 to change --

8 A. Administrative.

9 Q. -- but, typically, I'm not trying to pin you down  
10 into a specific percentage, but I want to get a ball  
11 park.

12 A. Right. Probably about 30 percent.

13 MS. BAGLEY: Object to the form.

14 BY MR. McKEEBY:

15 Q. So roughly approximately 30 percent of your time is  
16 spent at the office.

17 A. Roughly.

18 Q. And that's been at least fairly consistent throughout  
19 your employment with Tyler depending on how busy you  
20 were with respect to out of -- out of office visits?  
21 Obviously, it sounds like if you're slower, you're  
22 probably in the office more.

23 A. Right.

24 Q. Okay. Let me go back to these different -- these

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1 five different types of training that you described.

2 And before I do that ask you: How do you know as an  
3 implementation consultant, Travis Void, where you are  
4 assigned on a particular week or month? How do you  
5 know where to go?

6 A. My project manager informs us.

7 Q. And how does she inform you?

8 A. Via phone call or email.

9 Q. Is there a schedule for anything like that that you  
10 look at?

11 A. She would generally send us an email and then we  
12 would develop or I would develop an agenda based off  
13 of a template of another one.

14 Q. Okay. So in this email, what would she typically  
15 inform you? Obviously she would inform you of the  
16 client.

17 A. The client site, the dates they want me to be there,  
18 what they want to know.

19 Q. And when you say what they want to know, you mean the  
20 type of training you're to give.

21 A. Exactly.

22 Q. So it could be, for example, setup training, it could  
23 be conversion training. She would indicate in the  
24 email what type of training it would be.

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1 A. Exactly.

2 Q. Okay. And then from that you would develop the  
3 agenda from the template?

4 A. Yes.

5 Q. Would you need anything other than what she provided  
6 to you in the email to develop the agenda from the  
7 template?

8 A. If she provided enough information in the email, I  
9 would need to go to the knowledge base to pull up a  
10 base agenda and modify it depending on what the  
11 client is requesting to be trained on because they  
12 may not be requesting everything that's on our base  
13 agenda so we have to modify it per client.

14 Q. Okay. But my question goes to what information do  
15 you have to modify the base agenda to meet the  
16 client's needs and specifically does that information  
17 come from the email that your project manager would  
18 send you?

19 A. Yes. It comes from the email or the phone call.

20 Q. With the project manager.

21 A. Yes.

22 Q. At this point in the process, it's not typical for  
23 you to have spoken to the client to assist with your  
24 preparation of the agenda.

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1 A. Right.

2 Q. And when you use the term agenda, tell me what that  
3 means. Is agenda -- because I think of agenda as  
4 meaning possibly, you know, the schedule for the  
5 trip, or it could mean here are the topics that I'm  
6 going to cover, or I suppose it could mean something  
7 else. Those are the two examples that I can think  
8 about. What's closer to what you meant when you said  
9 agenda?

10 A. It goes over what modules we're going to be training  
11 in, and under the module, what programs within the  
12 module would we go over.

13 Q. Does it talk about the schedule for those different  
14 tasks?

15 A. Yes. It'll have, like, Monday, and they'll set a  
16 time for the specific task to be completed, and we  
17 try to keep it within that time on the agenda.

18 Q. Who sets the time for the task to be completed?

19 A. Project manager.

20 Q. And then you set the agenda to try to accomplish that  
21 task within the deadline set by the project manager.

22 A. Yes.

23 Q. Do you submit the agenda for approval to the project  
24 manager?

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1 A. Not all the time. Sometimes they'll just tell us to  
2 go with what we have.

3 Q. Do you submit the agenda to the client for approval?

4 A. Yes.

5 Q. And is that something that's done before you get to  
6 the customer location?

7 A. Yes.

8 Q. So you would send it directly via email to the client  
9 and say something along the lines of, here's the  
10 agenda, here's what we're planning. Does this  
11 correspond with your needs?

12 A. Not does it correspond to your needs, but they get  
13 the right people to be in the right place at the  
14 right time to match the agenda and to see if we need  
15 to make any changes according to their schedule.

16 Q. So that goes more to the availability of the people  
17 who need to be trained.

18 A. Right.

19 Q. And the client, obviously, is going to have more  
20 information about that than you would.

21 A. Exactly.

22 Q. I take it the five different types of support or  
23 training that you've listed are all of -- you've  
24 performed all of these things in your employment.

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1 A. Yes.

2 Q. When you're training regarding setting up the system,  
3 I take it you are training a particular segment of  
4 the employees of the customers during that training.

5 A. The setting up of the system?

6 Q. Yeah. Let me just tell you my thought, and you tell  
7 me if I'm wrong, but when you're doing the  
8 implementation training or the end user training,  
9 you've got to train the people who are actually going  
10 to be using the software. My impression is when  
11 you're doing the training on setting up the system is  
12 that you're training a different group of employees;  
13 is that accurate?

14 A. Yes.

15 Q. What group of employees are you training when you're  
16 training to set up the system?

17 A. A lot of times it's what we call the functional  
18 leaders, those who make the decisions on how it needs  
19 to be set up, also the IT department or the  
20 information technology department.

21 Q. Okay. Do you, prior to doing the training regarding  
22 setting up the system, need to know about the  
23 customer's previous legacy system?

24 A. We don't necessarily need to know everything about

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1           their previous system. We just need to know how they  
2           conducted business.

3       Q.   What's an example of how they conducted business with  
4           respect to financial software?

5       A.   How they handle an invoice that comes in.

6       Q.   And when you say how they handle an invoice, you mean  
7           where did it get routed, who needed to approve it,  
8           those kinds of things?

9       A.   Right. Right.

10      Q.   And so that has less to do with software and more to  
11          do with processes.

12      A.   Yes.

13      Q.   And how is it that you get that information from the  
14          client? Is that -- I'll leave it at that.

15      A.   That's more of the setup, so that's how we determine  
16          how the system needs to be set up based off of how  
17          they used to do business and how we can kind of keep  
18          it similar.

19      Q.   Right. Keep it similar within the MUNIS software.

20      A.   Yes.

21      Q.   So that's something -- that's information you gather  
22          from the client during this setup training?

23      A.   Yes.

24      Q.   Do you know the term systems analysis, system

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1 analysis?

2 A. Yes.

3 Q. My understanding, I'll tell you my understanding of  
4 system analysis is, and you can tell me if it's the  
5 same as yours or if I need to change it. It'll be  
6 pretty basic.

7 But my understanding of a system analysis is where  
8 someone from Tyler is sitting down with the company,  
9 the customer, and gathering information from the  
10 customer about their processes and how they, for  
11 example, handle invoices is the example that you  
12 used, and gathering that information from the  
13 customer. That's my understanding of a system  
14 analysis. Is that close?

15 A. It's close.

16 Q. Okay.

17 A. It's like an as is.

18 Q. Okay. An as is in the sense that you're learning  
19 what the customer's legacy system is.

20 A. Their processes within the legacy system.

21 Q. Got it. Got it. And my question is: I take it from  
22 your testimony that's work that you, as an  
23 implementation consultant, performed as part of your  
24 job.

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1 A. Yes.

2 MS. BAGLEY: Object to the form.

3 BY MR. McKEEBY:

4 Q. And so you, as an implementation consultant,  
5 performed systems analysis?

6 A. Yes.

7 MS. BAGLEY: Form.

8 BY MR. McKEEBY:

9 Q. Okay. So during this training regarding setting up  
10 the system, you're both training the customer as to  
11 Tyler system and gathering information about their  
12 processes.

13 A. Yes.

14 Q. When you're doing training regarding setting up the  
15 system, do you record that exchange of information in  
16 any type of report?

17 A. Yes.

18 Q. Is that a trip report?

19 A. It can be, but usually it's on an agenda.

20 Q. And what do you do with the agenda?

21 A. Submit it to the project manager.

22 Q. Is the project manager typically with you when you're  
23 doing the setup training?

24 A. No.

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1 Q. Okay. All right. Which one did you say? Conversion  
2 training.

3 A. Uh-huh.

4 Q. Get a new piece of paper. What is conversion  
5 training?

6 A. It's mapping the data showing them what fields they  
7 had in their -- what information they currently use,  
8 where that is in the new system, in MUNIS.

9 Q. So when you're doing conversion training, are you  
10 also training the functional leaders as you've  
11 described?

12 A. Yes.

13 Q. Is it typically the same functional leaders that you  
14 trained during the system setup training?

15 A. Yes.

16 Q. But the conversion training is done at a different  
17 phase of the overall training, agreed?

18 A. I guess if you're referring to this type of phase,  
19 it's all still phase one, I believe.

20 Q. Okay. But it's done without regard to that time  
21 sheet and those drop down boxes. It's done after the  
22 setup training.

23 A. Right.

24 Q. Would it be typical for you to make a separate trip

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- 1 to do the conversion training?
- 2 A. Yes.
- 3 Q. Would it be typical for you to do the conversion
- 4 training for the same client that you had done the
- 5 system setup training?
- 6 A. Yes.
- 7 Q. In other words, it would be unusual for you to pick
- 8 up the implementation process at the conversion
- 9 training stage.
- 10 A. Not unusual.
- 11 Q. Okay. Happens sometimes.
- 12 A. Yes.
- 13 Q. Okay. Now, I understand conversion, apart from
- 14 conversion training, but conversion to mean moving
- 15 the data from the customer's legacy system onto the
- 16 MUNIS system.
- 17 A. Yes.
- 18 Q. Am I correct that there is a separate department, I
- 19 mean separate from the implementation department at
- 20 Tyler, that does the actual conversion?
- 21 A. Yes.
- 22 Q. So when you're training the client on conversion
- 23 training, what is it that you're training them on?
- 24 A. What fields from the legacy system match up to the

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1 fields in the MUNIS system.

2 Q. And at the time you're doing the conversion training,  
3 has the data from the client's legacy system already  
4 been converted or not necessarily?

5 A. No. That's what we're preparing for.

6 Q. Got it. Okay. I'm familiar with another concept  
7 through the course of my studies on what  
8 implementation consultants do, and that is  
9 configuration.

10 A. Uh-huh.

11 Q. My understanding of configuration is that it has less  
12 to do with data movement and more to do with  
13 selecting different options within the Tyler MUNIS  
14 systems as to what to do with that data. That's  
15 pretty general, but is that your understanding of  
16 what configuration is?

17 A. Yes, setting up parameters.

18 Q. Setting up parameters is a good way to describe it.  
19 And is configuration, as you've just defined it or  
20 I've defined it with your systems, is that something  
21 that as an implementation coordinator you do?

22 A. Yes.

23 Q. And at what stage of the training do you do the  
24 configuration?

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1 A. That can be before and after the conversion so I've  
2 been different places where they've done it at  
3 different times.

4 Q. And is it -- when you're doing configuration are you  
5 training while you're doing it or you back at the  
6 hotel making the selections in the software based on  
7 the customer's input?

8 A. Both. At the hotel, we may get back and look at what  
9 we've discovered that day and prepare for the next  
10 day, and say, okay, the answer to these questions,  
11 their parameters may need to be set like this so  
12 we'll set up on maybe a document or set up another  
13 agenda for another trip to come out, and then when we  
14 have the parameters set up, we actually walk them  
15 through and show them, per your request and how you  
16 want to do business, these are the parameters that  
17 you have to choose from and you can set them up this  
18 way to follow this business practice or this way to  
19 follow this one and then they decide how they want to  
20 set up.

21 Q. So that's the training component of it?

22 A. Yes. That's still kind of with the set up because  
23 you're training them on how to do the parameters for  
24 the end users to use.

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1 Q. Right. Right. So it's sort of an aspect of set up.

2 A. Yes.

3 Q. Now, when you're doing the implementation training,

4 that's where you're training end users?

5 A. Yes.

6 Q. And is that in kind of a classroom style setting?

7 A. Yes.

8 Q. And do you as it -- would it be typical for you to

9 have the Tyler system up on, like, a projection?

10 A. Yes.

11 Q. And would it also be typical for the personnel of the

12 customers whom you are training to have laptops?

13 A. That's what we would like most of the times.

14 Q. Assuming they have laptops.

15 A. Exactly.

16 Q. It makes the training go a lot easier if they have

17 it.

18 A. Yes.

19 Q. And when you discussed the agenda a little while ago,

20 help me out here, I think you were talking about that

21 in connection with the setup training, do you do a

22 separate agenda for the implementation training?

23 A. Yes.

24 Q. And I take it a separate agenda for the conversion

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1 training as well.

2 A. Yes.

3 Q. And is the system or process rather the same in the  
4 sense of you are getting information from the project  
5 manager, and from that information, you're going to a  
6 template that you're modifying to fit the particular  
7 customer need?

8 A. Yes.

9 Q. And I take it with respect to implementation training  
10 as with respect to the other types of training, the  
11 project manager is giving you timelines or parameters  
12 with which you are to work to get the training done.

13 A. Yes.

14 Q. In what -- what does it mean for a customer to go  
15 live?

16 A. To switch from using the training database to now  
17 inputting everything into the live database and  
18 trying -- I guess you could kind of refer to it as  
19 weaning them off of their legacy system.

20 Q. Okay. And I understood from your previous testimony  
21 that you would typically be on site as an  
22 implementation consultant during the go live phase.

23 A. Yes.

24 Q. How long does that typically last or does it vary?

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**EXHIBIT 9**

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1 A. It varies on the client's size, smaller clients we  
2 may do go live -- go live is supposed to be like one  
3 day, but after the go live, you have a couple more  
4 days to kind of expand. Say, if you run into  
5 problems, you can call support and get stuff done.  
6 So typically two, three days for go live.

7 Q. But you also indicated a function called the post  
8 live support. Is that different from what you've  
9 described?

10 A. Yes.

11 Q. We'll talk about that separately.  
12 When you're with the client when they're going live,  
13 are you typically there by yourself or has the  
14 project manager joined you at that point?

15 A. It's varied because as you noticed before, I've had  
16 several different project managers, my current  
17 project manager and Sandy were the only two on site  
18 during go live.

19 Q. And is it your understanding that whether or not the  
20 project manager is with you on go live is more a  
21 function of the project manager's preference than the  
22 size of the account?

23 A. Not sure.

24 MS. BAGLEY: Object to the form.

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**EXHIBIT 9**



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1 MR. McKEEBY: What are you doing back here?

2 MS. BAGLEY: I was plugging in. Sorry. My  
3 computer died.

4 BY MR. McKEEBY:

5 Q. So you're not sure really what the reason was, but  
6 you know that some of your project managers have  
7 tended to be with you during the go live phase where  
8 other project managers have not.

9 A. Right.

10 Q. And during the go live phase, are you continuing to  
11 do training?

12 A. You do because you're constantly answering the  
13 questions from end users and some of the functional  
14 leads.

15 Q. Okay. But these -- that training is different from  
16 the other training that you've described in the sense  
17 that it's not based on a schedule or in a classroom  
18 setting, agreed?

19 A. It can be. There are instances where even at go live  
20 you'll have a classroom where people can come in and  
21 ask questions so it does turn into a classroom  
22 setting. They'll have a computer lab set up, and  
23 they'll say, well, we're going live, we'll have an  
24 implementer here to come and ask questions.

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1 Q. So you have kind of a station where people come to  
2 you and ask questions.

3 A. Yes.

4 Q. On an as-needed basis?

5 A. Yes.

6 Q. Are you also walking around the customer's facility  
7 to see how people are doing?

8 A. As much as possible.

9 Q. Do you have any documentation responsibilities with  
10 respect to the go live support?

11 A. Other than the trip report. The project manager does  
12 a lot more documentation when it comes to go lives  
13 and all the forms that need to be signed by the  
14 client.

15 Q. Okay. With respect to post live support, that, I  
16 take it is, is that done remotely?

17 A. No. Well, it depends on how you define that. Post  
18 live support for an implementer, we may go back after  
19 go live and just kind of sit around and help them go  
20 throughout the process. Then there's a transition to  
21 support.

22 Q. Okay. Let's talk first about the post live.

23 A. Okay.

24 Q. As I understand it, you're talking about a discreet

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1 period in which you go back to the client's site

2 after the go live process has occurred and you

3 provide assistance.

4 A. Exactly.

5 Q. And is that answering questions as they come up?

6 A. Answering questions, you may do some more training

7 during that.

8 Q. And who decides whether or not more training is to be

9 done?

10 A. That is discussed between the project manager and the

11 client.

12 Q. You ever have any input into those decisions in the

13 sense of --

14 A. Not really, just get told where I need to go.

15 Q. Okay. Okay. Do you have any reporting obligations

16 during the post live process?

17 A. Only with issues that come up, so if we have

18 something we have to report to support.

19 Q. Okay. Then this transition, what'd you call it?

20 A. Transition to support.

21 Q. How long a period of time is that or does it vary?

22 A. A day. That can be done remotely.

23 Q. Is it typically done remotely?

24 A. As far as my experience, a majority has been remotely

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1 over the phone.

2 Q. And is that contractually set up to be one day?

3 A. Yes.

4 Q. And is that basically a day in which the customer can

5 call the implementation consultant with whom it may

6 be more familiar and ask questions that thereafter

7 would be handled by the support department?

8 A. Yes.

9 Q. I take it that requires you to be at the office to be  
10 able to field those types of questions.

11 A. Yes.

12 Q. Are there -- is this transition to support day  
13 something that is in the customer contract that  
14 they've paid for or do you know?

15 A. I don't know.

16 Q. Is it scheduled in advance with you? That is, do you  
17 know that you're to be at the office on a particular  
18 day providing your day of transition to support for a  
19 particular client?

20 A. Yes. It has happened like that.

21 Q. And that's because the project manager will tell you,  
22 hey, on this date you need to be ready to man the  
23 phone.

24 A. Exactly.

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1 Q. Okay.

2 MS. BAGLEY: You okay.

3 MR. McKEEBY: Yeah. Just getting tired.

4 BY MR. McKEEBY:

5 Q. Okay. Do you ever get clients who over step the one  
6 day period and try to call you and ask you questions  
7 after the transition to support day?

8 A. Yes. There are many emails that come after -- after  
9 work.

10 Q. And have you received any instruction from your  
11 supervisors as to how you're to handle those types of  
12 inquiries that come in from clients after they  
13 supposedly were transitioned to support?

14 A. Point them to support.

15 Q. Okay. And that's, I take it, all your project  
16 managers have told you that?

17 A. Yes.

18 MR. McKEEBY: Can we go off the record for just  
19 a second? Can I take a two-second break?

20 (Recess taken.)

21 MR. McKEEBY: All right. I'm going to mark a  
22 document as, what am I on, 3?

23 THE WITNESS: Yes.

24

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1 A. I've been asked that many times, and I cannot  
2 remember. We asked it all going through school.

3 Q. When did you graduate?

4 A. 2005, I think 2005.

5 Q. Do you have a specialization?

6 A. Associate of Applied Science in IT web design.

7 Q. Have you taken any other courses since then, since  
8 you graduated I mean?

9 A. Unless we include the forklift training, that's about  
10 it.

11 Q. When did you get forklift training?

12 A. I supervised a warehouse, general services, so that  
13 was kind of under that umbrella of program assistant.

14 Q. When you were at the City of Durham you mean?

15 A. Yes.

16 Q. Did you get a certification for forklift operation?

17 A. Yes. Yes. Forklift and -- no. I didn't get the  
18 Bobcat one, just forklift.

19 MR. McKEEBY: And let me mark one more, Exhibit  
20 No. 6.

21 (Deposition Exhibit No. 6 was marked for  
22 identification.)

23 BY MR. McKEEBY:

24 Q. Would you agree with me that's the resume that you

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1 submitted to Tyler?

2 A. Yes.

3 MR. McKEEBY: Okay. I pass the witness.

4 CROSS EXAMINATION

5 BY MS. BAGLEY:

6 Q. Mr. Void, was your project manager or supervisor  
7 aware that you were working more than 40 hours per  
8 week some weeks that you worked at Tyler  
9 Technologies?

10 A. I would say yes because she was the one sending me  
11 emails and questions.

12 MS. BAGLEY: Okay. I have no further  
13 questions. I reserve the right to recall.

14 MR. McKEEBY: No other questions. Thank you.

15 (THEREUPON, THE WITNESS WAS DISMISSED.)

16

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